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November 18, 1997

Ms. Magalie Roman Salas
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Written ex parte presentation re: RM-9101;
Petition for Expedited Rulemaking of LCI International Telecom Corp.
and Competitive Telecommunications Association to establish
Technical Standards for OSS

Dear Ms. Salas:

Ameritech files this written ex parte presentation in the above-captioned proceeding, as required by Part 1.1206(a)(1)¹ of the Commission's Rules. This filing responds to verbal requests for comments on the recent proposal of the Local Competition Users Group, a group made up of LCI International Telecom Corp. and several other interexchange carriers (collectively, "IXCs") urging the adoption of so-called "service quality measurements"². The detailed analysis of this proposal is attached hereto (attachment A). This proposal would create a new layer of federal standards to be used in evaluating whether incumbent local exchange carriers ("ILECs") have satisfied their obligations, under the Commission's rules³ interpreting the Telecommunications Act of 1996,⁴ to provide nondiscriminatory access to their operations support system ("OSS") functions.

For the reasons explained below, the adoption of national standards as suggested by the IXCs would be both inappropriate and unnecessary. Moreover, the IXCs' demands for voluminous disaggregated data go far beyond the performance standards requirements advocated by the United States Department of Justice ("DOJ") and state regulators, and

¹ 47 CFR § 1.1206(a)(1).

² Local Competition Users Group (LCUG), Service Quality Measurements (SQM), September 26, 1997; Membership: AT&T, Sprint, MCI, LCI, WorldCom; Version 6.0 (filed September 29, 1997); Version 6.1 (filed October 22, 1997), (hereinafter "Service Quality Measurements document").

³ 47 CFR § 51.319(f).

⁴ 47 U.S.C. §§ 151 et seq. (hereinafter "1996 Act").

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promulgated by the Commission in its past Orders. Under the 1996 Act, performance standards are appropriately set in negotiated and arbitrated agreements entered in to by ILECs and interconnecting carriers. The Commission should reject this transparent attempt by the IXC's to further delay entry by the Regional Bell Operating Companies ("RBOCs") into the long distance marketplace.

It is worthy of note that the Commission has already twice rejected such calls from the IXC's to delay RBOC entry into the long distance marketplace pending development and final adoption of national standards for access to OSS functions. Rejecting AT&T's earlier arguments to that effect, the Commission expressly elected in August 1996 not to wait for national standards.⁵ Over Sprint's protest, that decision was affirmed in December 1996, when the Commission stated unequivocally that "it is apparent from arbitration agreements and *ex parte* submissions that access to OSS functions can be provided without national standards" and that "such a requirement would significantly and needlessly delay competitive entry."⁶

In hindsight, the Commission's reliance upon arbitration and negotiation at the state level was justified, as those processes continue to produce effective and valid agreed-upon mechanisms and performance standards for OSS function access. To date, Ameritech is already providing OSS function access under more than seventy negotiated and arbitrated interconnection agreements. In many cases, the arrangements and standards contained in these agreements conform to -- and indeed often go beyond -- the requirements imposed by regulators.⁷ In fact, during the arbitration of its interconnection agreement with Ameritech - Illinois, AT&T was forced by the Illinois Commerce Commission to drop its demands for a similarly-vast array of proposed additional performance measurements (which it styled Direct Measures of Quality, or "DMOQs") pertaining to OSS function access. Many of those same measurements have reappeared in the form of the "service quality measurements" now being demanded by the IXC's.

⁵ In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd. 15499 (1996), at ¶¶ 527-8.

⁶ In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, Second Order on Reconsideration, 11 FCC Rcd. 19738 (1996), at ¶ 13.

⁷ These arrangements and standards have also been held to comply with relevant state law requirements. For example, despite AT&T's arguments for the imposition of additional OSS function access performance standards, the standards contained in Ameritech's interconnection agreement with AT&T were found by the Michigan PSC to be "consistent with federal and state law, and ... in the public interest." MPSC Docket No. U-11151/11152, Order (April 4, 1997), at 5.

In providing requesting carriers with nondiscriminatory access to its OSS functions, Ameritech will continue to comply with all applicable reporting requirements for purposes of securing in-region interLATA authority under Section 271⁸ of the 1996 Act. For over a year, the Commission has had rules in place requiring ILECs to provide interconnection,⁹ unbundled network elements¹⁰ and resale services¹¹ on a nondiscriminatory basis.¹² The RBOCs' nondiscrimination reporting requirements related to OSS function access were more recently expanded and clarified in the Commission's August 19th Order¹³ rejecting Ameritech's latest application for in-region interLATA authority within the state of Michigan. Ameritech intends to fully comply with those requirements.

As even a cursory review of Attachment A reveals, however, it is clear that the reporting structure now proposed by the IXC's goes far beyond any lawfully-imposed requirements. In many cases, despite the IXC's claim that their so-called "performance measurements" are required to "measure the ILECs performances for all the essential OSS categories",¹⁴ the data proposed by the IXC's have nothing whatsoever to do with access to OSS functions; rather, they are substantive measures of product or service performance,¹⁵ upon which Ameritech and other ILECs already report in other contexts and formats.

⁸ 47 U.S.C. §§ 271(c)(2)(A)(ii); (c)(2)(B)(i), (ii), (xiv).

⁹ 47 CFR §§ 51.305(a)(3), (5).

¹⁰ 47 CFR § 51.311(a), (b).

¹¹ 47 CFR § 51.603(a), (b). To the extent that these resale-related rules were vacated as part of the Eighth Circuit Court of Appeals' recent opinion (see Iowa Utilities Board et al. v. FCC, 120 F.3d 733, at n. 39), the Commission should reinstate them.

¹² Some have argued that even the Commission's existing requirements may unfairly preclude long distance competition. As Senate Commerce Committee Chairman John McCain has put it, "I am extremely concerned that the FCC and the Department of Justice may be interpreting the checklist requirements so unrealistically that it has become practically impossible for any local telephone company to meet them." Arizona Republic, November 7, 1997 (p. E2).

¹³ In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, Memorandum Opinion and Order, FCC 97-298 (rel. August 19, 1997), at ¶ 212.

¹⁴ Service Quality Measurements document, at 3.

¹⁵ For example, although they are listed under the headings "Ordering and Provisioning" (which are in fact two of the five OSS functions to which equivalent access must be provided by ILECs), the IXC's proposed measurements titled "Average Completion Interval" and "Percent Orders Completed on Time" (Service Quality Measurements document, at 23) have absolutely nothing to do with OSS function access. They are more appropriately categorized as broad "parity" measurements, and do have relevance to some nondiscrimination concerns related to resale.

Moreover, the absurd level of disaggregation demanded by the IXC's in their proposed reporting requirements would create a completely unjustified resource drain. Literal compliance with the IXC's demands -- if it were possible¹⁶ -- would produce over 1.9 million data elements each month from Ameritech alone. The sheer mass of information demanded by the IXC's, if physically produced by all LECs,¹⁷ would obviously preclude any meaningful analysis by regulators, carriers, or other interested parties.

Despite their rhetoric, the IXC's have provided absolutely no evidence that consumers would be served in any way by the imposition of these so-called "performance standards".¹⁸ Ameritech submits that consumers would not, and could not, benefit from the expenditure of the significant time, resources and capital required to capture, track, report on and analyze the deeply-disaggregated data listed in the IXC's 60-page proposal. Such a diversion of resources from the business of meeting customer service requirements in a timely, attentive manner simply cannot be justified. Continued good-faith bargaining by the parties to interconnection agreements, through the negotiation and arbitration processes established for this purpose by Congress in the 1996 Act, should continue to be the vehicle by which performance standards are agreed upon between interconnecting carriers.

Sincerely,



attachment

¹⁶ In some cases, literal compliance is simply not possible. For example, the IXC's demand for submission of all data "by the 5th scheduled business day following the close of the calendar report month" (Service Quality Measurements document, at 5) is not attainable given the technology currently involved. As specified in its interconnection agreements negotiated with AT&T, MCI and others, Ameritech's reporting systems are capable of providing performance reports on the 22nd calendar day of each month.

¹⁷ As the IXC's proposal makes no affirmative promise that they themselves would agree to comply with their own requirements, they may not have realized the "boomerang" effect of the burdens which they propose. Since nondiscrimination (in resale and other duties) is an obligation of all local exchange carriers under 47 U.S.C. §251(b), the reporting burden imposed by many of the so-called "performance standards" would also fall upon the IXC's themselves if and when they elected to enter the local exchange marketplace. The Commission should expressly recognize this fact in any further consideration of this matter.

¹⁸ MCI has argued for the piling on of yet another layer of measurements (four pages of additional reporting requirements are proposed), stating somewhat circuitously that "(i)n addition to the measurements set forth in the LCUG Service Quality Measurements document, MCI must measure the following experiences to ensure that the end user experience is adequately measured." Ex Parte Statement of MCI, CC Docket No. 96-98 (filed October 22, 1997), at 2. No legal or factual argument is provided in support of this claim, nor of any resulting end-user benefit.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
Pre-Ordering PO-1 <ul style="list-style-type: none"> Average Response Interval for Pre-Ordering Information Due Date Reservation Feature Function Availability Facility Availability Street Address Validation Service Availability Information Appointment Scheduling Customer Service Records Telephone Number Rejected or Failed Queries 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure The nature of the CLEC request (e.g. number of lines, complexity of customer, time of day, length of the record) causes large variability in the measurement results and in the ability to meet absolute performance standards. The CLEC's ability to design its own GUI interfaces further minimizes the significance of response times. 	<ul style="list-style-type: none"> Average CSR Cycle Time (in Sec) Average Telephone Number Selection Cycle (in sec) Average Due Date Selection Cycle Time (in sec) Average OSS Response Time – Address Validation Average OSS Response Time – Feature Function Availability
Ordering and Provisioning OP-1 <ul style="list-style-type: none"> Mean (Average) Completion Interval¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Ameritech's method of calculation will be based on when the order is completed, not when a completion notice is sent. Ameritech addresses timeliness of completion notices in a separate measure (See Completion Notice Interval OP-7). We dispute the meaningfulness of this measure as intervals are in many cases contractually agreed upon in the interconnection agreements. Ameritech feels a true measure of ILEC Installation performance is its "Confirmed Due Dates Not Met." 	<ul style="list-style-type: none"> Average Installation Interval
OP-2 <ul style="list-style-type: none"> Percent Orders Completed on Time ¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure 	<ul style="list-style-type: none"> Confirmed Due Dates Not Met

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
OP-3 <ul style="list-style-type: none"> Percent of Order Accuracy ¹ 	<ul style="list-style-type: none"> Ameritech Reporting a Similar Measure "New Service Failures" addresses FCC intent of this measure since it measures both service order and provisioning accuracy and has been a proven measure over time. Ameritech will consider an audit to address this. 	<ul style="list-style-type: none"> New Service Failures
OP-4 <ul style="list-style-type: none"> Mean Reject Interval ¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Because the ability to prevent order rejection rests primarily with the CLEC, this measure is not a significant indicator of ILEC performance. 	<ul style="list-style-type: none"> Average Electronic Order Reject Time Average Manual Order Reject Time
OP-5 <ul style="list-style-type: none"> Mean FOC Interval ¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure FOC timeliness is not a service affecting measure, therefore an aggressive performance target, such as the one suggested by LCUG is not warranted. The suggested target is inconsistent with the signed interconnection agreements. The more meaningful measure is "Confirmed Due Dates Not Met". 	<ul style="list-style-type: none"> Average Firm Order Confirmation – Electronic Orders Average Firm Order Confirmation – Manual Orders
OP-6 <ul style="list-style-type: none"> Mean Jeopardy Interval ¹ 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report The longer the jeopardy interval, the more likely it is that Ameritech will resolve the jeopardy prior to the due date. Therefore, the longer the jeopardy interval, the less correlation this measure has to missed due dates (which Ameritech reports). While, the shorter the interval the less difference between this measure and missed due dates (which Ameritech reports). Ameritech will notify the CLECs on a real time basis for orders in jeopardy of missing the due date. Based on the nature of the jeopardy (e.g. weather, facilities), this notification will come from different sources and at different times. 	<ul style="list-style-type: none"> Confirmed Due Dates Not Met
OP-7 <ul style="list-style-type: none"> Completion Notice Interval ¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Reporting Systems do not allow tracking at the suggested level. 	<ul style="list-style-type: none"> Order EDI Completion

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
OP-8 <ul style="list-style-type: none"> Percent Jeopardies Returned ¹ 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report It is unclear what the intent of this measure is, as jeopardies do not necessarily result in missed due dates. Jeopardy status on an order is as of a point in time and can accordingly fluctuate throughout the day and day to day. 	<ul style="list-style-type: none"> Confirmed Due Dates Not Met
OP-9 <ul style="list-style-type: none"> Mean Held Order Interval ¹ 	<ul style="list-style-type: none"> Ameritech Reporting a Similar Measure Ameritech believes that its "Installation Interval" and "Confirmed Due Dates Not Met" measures address the intent of this measure. 	<ul style="list-style-type: none"> Installation Interval Confirmed Due Dates Not Met
OP-10 <ul style="list-style-type: none"> Percent Orders Held ≥ 90 Days ¹ 	<ul style="list-style-type: none"> Ameritech Reporting a Similar Measure See Mean Held Order Interval. 	<ul style="list-style-type: none"> Installation Interval Confirmed Due Dates Not Met
OP-11 <ul style="list-style-type: none"> Percent Orders Held ≥ 15 Days ¹ 	<ul style="list-style-type: none"> Ameritech Reporting a Similar Measure See Mean Held Order Interval. 	<ul style="list-style-type: none"> Installation Interval Confirmed Due Dates Not Met
Maintenance and Repair MR-1 <ul style="list-style-type: none"> Mean Time to Restore¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Ameritech's calculation of its "Mean Time to Repair" is based on the time when the repair is completed, not when repair notification is made to the CLEC. Ameritech also measures "Out of Service" which addresses repair performance. 	<ul style="list-style-type: none"> Mean Time To Repair Out of Service > X Hours
MR-2 <ul style="list-style-type: none"> Repeat Trouble Rate¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure 	<ul style="list-style-type: none"> Percent Repeats
MR-3 <ul style="list-style-type: none"> Trouble Rate¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure 	<ul style="list-style-type: none"> Trouble Report Rate
MR-4 <ul style="list-style-type: none"> Percentage of Customer Troubles Resolved Within Estimate¹ 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report Ameritech believes that its "Mean Time to Repair" and "Out of Service" measure adequately addresses its maintenance performance. 	<ul style="list-style-type: none"> Mean Time to Repair Out of Service > X Hours

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
General GE-1 <ul style="list-style-type: none"> Percent System Availability¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Ameritech currently reports system availability on the basis of the availability of the function. Where completion of a transaction simply requires access to the interface, the measurements reflect availability of the interface. Where performance requires access to both the interface and the legacy systems, Ameritech's measurements reflect the availability of both. 	<ul style="list-style-type: none"> OSS Availability - Customer Service Records OSS Availability - Telephone Number Selection OSS Interface Availability -Due Date Selection OSS Interface Availability - Address Validation
GE-2 <ul style="list-style-type: none"> Mean Time to Answer Calls 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure The interconnection agreements require, and wholesale pricing is based on, the CLEC's usage of electronic interfaces for most business needs. Therefore, retail speed of answer measure for end users is not comparable to wholesale speed of answer for CLECs and should not be used for parity purposes. 	<ul style="list-style-type: none"> Average Speed of Answer - Ordering Average Speed of Answer - Repair
GE-3 <ul style="list-style-type: none"> Call Abandonment Rate 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report A high correlation exists between this measure and Ameritech's "Average Speed of Answer". 	
Billing BI-1 <ul style="list-style-type: none"> Mean Time to Provide Recorded Usage Records¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure 	<ul style="list-style-type: none"> Average Time to Send Usage
BI-2 <ul style="list-style-type: none"> Mean Time to Deliver Invoices¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure 	<ul style="list-style-type: none"> AEBS Billing CABS Billing
BI-3 <ul style="list-style-type: none"> Percent Invoice Accuracy¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Comparison to the Bill Accuracy process for IXC long distance end user billing and the billing process of IXC access is not warranted; those processes are contractually agreed to and consideration is provided. 	<ul style="list-style-type: none"> Bill Accuracy

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
BI-4 <ul style="list-style-type: none"> Percent Usage Accuracy¹ 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Suggested comparison to the Usage Accuracy process for IXC long distance end user billing and the billing process of IXC access charges is not appropriate since these processes are contractually agreed upon and consideration is provided. 	<ul style="list-style-type: none"> Usage Accuracy
Operator Services and Directory Assistance OS/DA-1 <ul style="list-style-type: none"> Mean Time to Answer¹ 	<ul style="list-style-type: none"> Ameritech Reporting as Specified in the Interconnection Agreements All OS/DA calls enter the same queue and therefore parity is assured. This measure can only be reported on an aggregated basis. 	<ul style="list-style-type: none"> Average Speed of Answer
Network Performance NP-1 Transmission Quality: <ul style="list-style-type: none"> Subscriber Loop Loss¹ Signal to Noise Ratio¹ Idle Channel Circuit Noise¹ Loop-Circuit Balance¹ Circuit Notched Noise¹ Attenuation Distortion¹ 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report These proposed measures reflect standards in infrastructure design and parity is therefore inherent. Transmission quality testing is cost prohibitive and requires the interruption of the end users' phone service. 	

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

ANALYSIS OF LCUG PERFORMANCE MEASUREMENTS

LCUG Category	Ameritech Assessment	Ameritech Performance Measures
NP-1 Speed of Connection: <ul style="list-style-type: none"> Dial Tone Delay¹ Post Dial Delay¹ Call Completion/Delivery Rate¹ 	<ul style="list-style-type: none"> Ameritech Does Not Propose to Report These proposed measures reflect standards in infrastructure design and parity is therefore inherent. Dial Tone Delay is tracked internally in aggregate across each switch. In a multi-network environment determining the cause of post dial delay would be extremely difficult, if not impossible. Therefore, measuring the post-dial delay would only add significant expense and burdensome reporting requirements for the ILECs. Due to the complexity of the multi-network environment, determining when a successful call completion occurs and determining the source of unsuccessful call completions (CPE equipment, CLEC Trunk, ICO Trunk, etc) would be an inexact science. If Ameritech were able to measure this, it would be on an aggregate basis, as the switch does not distinguish by customer type, as was previously mentioned. 	
NP-1 <ul style="list-style-type: none"> Network Incident Affecting > 5000 Blocked Calls¹ Network Incident Affecting > 100,000 Blocked Calls¹ 	<ul style="list-style-type: none"> Ameritech Reporting a Similar Measure The FCC already requires reporting for blocked calls. As with previous network type measures, the network can not discern between CLEC and ILEC customers. Notification by the ILEC to the CLEC of major network outages is available. 	<ul style="list-style-type: none"> FCC Reportable
Interconnect/Unbundled Elements Combos IUE-1 <ul style="list-style-type: none"> Availability of Network Elements 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Ameritech is currently looking into appropriate function availability measures. Additional specificity is required in order for a proper assessment to be made. 	<ul style="list-style-type: none"> At discussion stage
IUE-2 <ul style="list-style-type: none"> Timeliness of Element Performance 	<ul style="list-style-type: none"> Ameritech Reporting/Planning to Report Basic Measure Ameritech is currently looking into appropriate timeliness of element performance measures. Additional specificity is required in order for a proper assessment to be made. 	<ul style="list-style-type: none"> At discussion stage

¹ Ameritech disputes the LCUG proposed level of disaggregation. See the cover letter dated November 18, 1997, addressed to Magalie Roman Salas, for further explanation.

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of Ameritech's Written Ex Parte Presentation re: RM-9101 has been served on the parties on the attached service list, via first class mail, postage prepaid, on this 18th day of November, 1997.

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